

Carol Ann Slocum, Esquire

Mark B. Sheppard, Esquire (*pro hac vice* admission pending)

James A. Petkun, Esquire (*pro hac vice* admission pending)

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RICHARD MCBRIDE, JOHN BEVERLY,
VICTOR LAMSON, DONALD TAYLOR,
RYAN FENNAL, MICHAEL VENEZIALE,
THOMAS MONZO, MANUEL
MARTINEZ, DANIEL MITCHELL,
KEVIN CUNNINGHAM, JUAN LOPEZ,
WAYNE GROVE, WILLIAM NEWNAM,
JR., and RYAN SHORT,

Plaintiffs

v.

KLINE CONSTRUCTION CO., INC.,
KLINE CONSTRUCTION CO., INC.
401(K) PLAN, KATHERINE KLINE-
PENATE, J. EDWARD KLINE, and
ROBERT MILLER,

Defendants.

Civil Action No.: 1:19-cv-14275-NLH-JS

JURY TRIAL DEMANDED

**NOTICE OF MOTION FOR AN ORDER
GRANTING PRO HAC VICE
ADMISSION OF JAMES A. PETKUN,
ESQ.**

TO: Frank R. Schirripa
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Counsel for Plaintiff

PLEASE TAKE NOTICE that the undersigned attorneys for Defendants J. Edward Kline and Katherine M. Kline-Penate will move before this Honorable Court for entry of an Order granting the admission of attorney, James A. Petkun, as *pro hac vice* counsel in this action.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendants shall rely on the accompanying Certification of Carol Ann Slocum and the Certification of James A. Petkun. We submit this motion for disposition on the papers, and without oral argument, pursuant to Fed. R. Civ. P. 78 and L. Civil R. 78.1. A proposed Order is enclosed.

Dated: October 30, 2019

By: /s/ Carol Ann Slocum
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